

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) JOSE JESUS SANCHEZ-MENDEZ,
a.k.a. "MICHOACÁNO,"

[DOB: 05-21-1981 or 05-21-1983],

(2) JESUS MORALES-GARCIA,
a.k.a. "DON JESUS,"

[DOB: 08-12-1978],

(3) LUIS EDUARDO PINEDA-ZARAO,

[DOB: 08-16-1995],

**(4) JUAN BERNARDO GALEANA-
AGUILAR,**

[DOB: 10-18-1976],

**(5) SANTIAGO RAUL MENDIETA-
SANCHEZ,**

[DOB: 03-09-1981],

**(6) BALTAZAR FLORES-
NORZAGARAY,**

a.k.a. "SINALOA,"

[DOB: 10-15-1971],

(7) FELTON STONE, JR.,

[DOB: 12-11-1976],

(8) DONALD R. MOSES,

a.k.a. "MOE,"

[DOB: 08-07-1970],

(9) RAFAEL PEREZ-ESQUIVEL,

[DOB: 02-28-1979],

(10) FLOR GONZALEZ-CELESTINE,

[DOB: 10-05-1969],

Case No. 22-00125-01/44-CR-W-BP

COUNT 1

Continuing Criminal Enterprise

21 U.S.C. § 848(a)

NLT 20 Years' Imprisonment

NMT Life Imprisonment

NMT \$2,000,000 fine

NMT 5 Years' Supervised Release

Class A Felony

COUNT 2

*Conspiracy to Distribute 500 Grams or More of
Methamphetamine and One Kilogram or More of
Heroin*

21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 846

NLT 10 Years' Imprisonment

NMT Life Imprisonment

NMT \$10,000,000 fine

NLT 5 Years' Supervised Release

Class A Felony

COUNT 3

Conspiracy to Commit Money Laundering

18 U.S.C. § 1956(h)

NMT 20 Years' Imprisonment

NMT \$500,000 Fine

NMT 3 Years' Supervised Release

Class C Felony

COUNTS 4–10, 13, 17, 19, 21, 40, 68, & 75

*Distribution of Heroin, Acetyl Fentanyl, and
Methamphetamine*

21 U.S.C. § 841(a)(1) and (b)(1)(C)

NMT 20 Years' Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years' Supervised Release

Class C Felony

COUNT 11

Concealment Money Laundering

18 U.S.C. § 1956(a)(1)(B)(i)

(11) TINA MARIE CRUCES,
[DOB: 02-26-1986],

(12) JOSE ELIAZAR VALLE-RIVERA,
[DOB: 08-04-1982],

(13) MARCO ANTONIO SALAZAR,
a.k.a. "TOÑO,"
[DOB: 01-08-1993],

(14) UZIEL MORALES-BALTAZAR,
[DOB: 05-16-1991],

(15) JOSE BERNABE ZAMORA-
CARDENAS,
a.k.a. "MUFA,"
[DOB: 03-13-1970],

(16) LISBET ESPINO,
[DOB: 04-07-1998],

(17) FELIPE ANTONIO ALCALA,
[DOB: 06-15-1992],

(18) ERICK FERNANDO MARTINEZ
CONTRERAS,
a.k.a. "ALEX,"
[DOB: 08-18-1987],

(19) ANTHONY C. HUGHES,
[DOB: 03-23-1985],

(20) JENNIFER S. LAWSON,
[DOB: 01-09-1987],

(21) JOEL ENRIQUE ROMAN,
a.k.a. "PELON,"
[DOB: 03-16-1978],

(22) FRANK ANTHONY VALDIVIA,
[DOB: 06-15-1979],

(23) MELISSA A. BATES,
[DOB: 01-07-1967],

NMT 20 Years' Imprisonment
NMT \$500,000 Fine
NMT 3 Years' Supervised Release
Class C Felony

COUNTS 12, 16, 38, 63, & 78

Reentry by an Illegal Alien
8 U.S.C. § 1326(a)
NMT 2 Years' Imprisonment
NMT \$250,000 Fine
NMT 1 Year Supervised Release
Class E Felony

**COUNTS 14–15, 18, 20, 22, 24, 26–29, 32, 36–
37, 39, 52, 61, 69, 72, 76–77, 90, 93, 96, & 102**

*Distribution of 50 Grams or More of Actual
Methamphetamine*
21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years' Imprisonment
NMT Life Imprisonment
NMT \$10,000,000 fine
NLT 5 Years' Supervised Release
Class A Felony

COUNTS 23, 41, 80, 83, 87, 101, 107, & 112

*Possession of a Firearm in Furtherance of a
Drug Trafficking Offense*
18 U.S.C. § 924(c)(1)(A)(i)
NLT 5 Years' Imprisonment
(Consecutive to Any Other Sentences)
NMT Life Imprisonment
NMT \$250,000 Fine
NMT 5 Years' Supervised Release
Class A Felony

**COUNTS 25, 31, 33–35, 42–51, 53–60, 64–67,
70–71, 73–74, 91–92, 94–95, & 97–99**

*Use of a Communication Facility to Facilitate a
Drug Trafficking Crime*
21 U.S.C. § 843(b) and (d)(1)
NMT 4 Years' Imprisonment
NMT \$250,000 Fine
NMT 1 Year' Supervised Release
Class E Felony

(24) MONICA L. MCCUBBIN,
[DOB: 01-12-1983],

(25) MIGUEL ANGEL JUAREZ-LOPEZ,
a.k.a. “CHAPO,”
[DOB: 04-09-1975],

(26) MARIA NANCY VALDEZ,
[DOB: 02-10-1990],

(27) IGNACIO BARRAGAN-VAZQUEZ,
[DOB: 01-14-1990],

(28) JONATHAN ZUNIGA-
VILLAFUERTE,
[DOB: 07-07-1991],

(29) YVONNE GUZMAN-CARPIO,
a.k.a. “MORENA,”
[DOB: 03-30-1983],

(30) NELSON ALIRIO GARCIA-
GUERRA,
[DOB: 03-21-1994],

(31) KONGMHINK HER,
[DOB: 03-25-1981],

(32) SERGIO ARMANDO VALENCIA-
OCHOA,
[DOB: 11-23-1985],

(33) JUAN HUMBERTO LEMUS-
MEJIA,
[DOB: 12-18-1997],

(34) YULIANA DEL CARMEN PEREZ
CIPRIAN,
[DOB: 12-18-1983],

(35) TRINIDAD TORRES-MEZA,
[DOB: 01-23-1981],

(36) MIRIAM VERONICA BUSTOS-
MARTINEZ,
[DOB: 12-05-1984],

COUNTS 30, 79, 85–86, 88, 100, 103–05, & 111

Possession with Intent to Distribute 50 Grams or More of Actual Methamphetamine, 500 Grams or More of Methamphetamine, One Kilogram or More of Heroin, Five Kilograms or More of Cocaine, and 400 Grams or More of Fentanyl
21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years’ Imprisonment
NMT Life Imprisonment
NMT \$10,000,000 fine
NLT 5 Years’ Supervised Release
Class A Felony

COUNT 62

Illegal Alien in Possession of a Firearm
18 U.S.C. § 922(g)(5) and 924(a)(2)
NMT 10 Years’ Imprisonment
NMT \$250,000 Fine
NMT 3 Years’ Supervised Release
Class C Felony

COUNTS 81 & 84

Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1) and 924(a)(2)
NMT 10 Years’ Imprisonment
NMT \$250,000 Fine
NMT 3 Years’ Supervised Release
Class C Felony

COUNTS 82, 108, & 110

Possession With Intent to Distribute Methamphetamine and Cocaine
21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years’ Imprisonment
NMT \$1,000,000 Fine
NLT 3 Years’ Supervised Release
Class C Felony

COUNTS 89 & 109

Distribution and Possession with Intent to Distribute Five Grams or More of Actual Methamphetamine
21 U.S.C. § 841(a)(1) and (b)(1)(B)
NLT 5 Years’ Imprisonment
NMT 40 Years’ Imprisonment

(37) LILIANA VALENCIA-MENDOZA,
[DOB: 08-16-1981],

(38) ARANTXA SABRINA
VALDERRAMA-BARROS,
a.k.a. "SABRI,"
[DOB: 02-02-1997],

(39) DANIEL FELIPE SUAREZ-
REINOSO,
[DOB: 10-15-1991],

(40) JAVIER A. ALVAREZ,
[DOB: 11-09-1997],

(41) JOHN A. CAYLOR,
a.k.a. "JOHN TAYLOR,"
[DOB: 12-01-1968],

(42) ANA LILIA LEAL-MARTINEZ,
[DOB: 01-08-1976],

(43) ANA PAOLA BANDA,
[DOB: 07-29-1972],

and

(44) MARIA DE LOURDES CARBAJAL,
[DOB: 07-28-1969],

Defendants.

NMT \$5,000,000 fine
NLT 4 Years' Supervised Release
Class B Felony

COUNT 106

*Possession with Intent to Distribute
Methamphetamine and Fentanyl within 1,000
Feet of a Public or Private School*
21 U.S.C. §§ 841(a)(1) and 860(a)
NLT 10 Years' Imprisonment
NMT Life Imprisonment
NMT \$20,000,000 Fine
NLT 10 Years' Supervised Release
Class A Felony

FORFEITURE ALLEGATION ONE

21 U.S.C. § 853

FORFEITURE ALLEGATION TWO

18 U.S.C. § 982(a)(1)

\$100 Special Assessment (Each Count)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

DEFENDANT	COUNTS
(1) Jose Jesus Sanchez-Mendez	1–3, 11–12, 42–47, 49–55, 65–67, 70–71, 104, FA1, & FA2
(2) Jesus Morales-Garcia	1, 2, 30–35, 39, 48, 56–64, 72–74, 77, 91, 92, 95, 97–98, & FA1
(3) Luis Eduardo Pineda-Zarao	2, 42, 47, 51, 55, & FA1
(4) Juan Bernardo Galeana-Aguilar	2, 34, 91–92, 97, & FA1
(5) Santiago Raul Mendieta-Sanchez	2, 35, 43, 48, 57–58, 94, & FA1
(6) Baltazar Flores-Norzagaray	2, 24, 28–29, 37–38, 41, & FA1

(7) Felton Stone, Jr.	2, 31, 33, 56, 59–60, 64, & FA1
(8) Donald R. Moses	2, 44, 46, 65, 70, 98, 105–07, & FA1
(9) Rafael Perez-Esquivel	2, 22–23, & FA1
(10) Flor Gonzalez-Celestine	2, 15–16, 18, 20, 24, & FA1
(11) Tina Marie Cruces	2, 88–89, & FA1
(12) Jose Eliazar Valle-Rivera	2, 69, & FA1
(13) Marco Antonio Salazar	2, 25, & FA1
(14) Uziel Morales-Baltazar	2, 14, & FA1
(15) Jose Bernabe Zamora-Cardenas	2–3, 73, 77–78, FA1, & FA2
(16) Lisbet Espino	2, 45, 50, 52, 54, 76, 111–12, & FA1
(17) Felipe Antonio Alcala	2, 86–87, & FA1
(18) Erick Fernando Martinez Contreras	2, 94, 102, & FA1
(19) Anthony C. Hughes	2, 27, 50, 71, 109–10, & FA1
(20) Jennifer S. Lawson	2, 4–10, 26–27, 32, 36, 45, 76, & FA1
(21) Joel Enrique Roman	2, 49, 53, 79–81, 85, & FA1
(22) Frank Anthony Valdivia	2, 74, 99, 108, & FA1
(23) Melissa A. Bates	2, 89–90, 93, 96, 100–01, & FA1
(24) Monica L. McCubbin	2, 49, & FA1
(25) Miguel Angel Juarez-Lopez	2 & FA1
(26) Maria Nancy Valdez	2 & FA1
(27) Ignacio Barragan-Vazquez	2 & FA1
(28) Jonathan Zuniga-Villafuerte	2 & FA1
(29) Yvonne Guzman-Carpio	2 & FA1
(30) Nelson Alirio Garcia-Guerra	2 & FA1
(31) Kongmhink Her	2 & FA1
(32) Sergio Armando Valencia-Ochoa	2–3, FA1, & FA2
(33) Juan Humberto Lemus-Mejia	2, 66, & FA1
(34) Yuliana Del Carmen Perez Ciprian	2, 67, 70, 104, & FA1
(35) Trinidad Torres-Meza	2, 15, & FA1
(36) Miriam Veronica Bustos-Martinez	2, 95, & FA1
(37) Liliana Valencia-Mendoza	2–3, 30, FA1, & FA2
(38) Arantxa Sabrina Valderrama-Barros	2 & FA1
(39) Daniel Felipe Suarez-Reinoso	2–3, FA1, & FA2
(40) Javier A. Alvarez	2, 103, & FA1
(41) John A. Caylor	2, 13, 17, 19, 21, 40, 68, 75, 82–84, & FA1
(42) Ana Lilia Leal-Martinez	2–3, FA1, & FA2
(43) Ana Paola Banda	2–3, FA1, & FA2
(44) Maria de Lourdes Carbajal	2–3, FA1, & FA2

COUNT ONE

Beginning on an unknown date, but no later than on or about February 28, 2020, and continuing through the date of this indictment, said dates being approximate, in Jackson County, within the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** did knowingly and intentionally engage in a continuing criminal enterprise by knowingly and intentionally violating Title 21, United States Code, Sections 841, 843(b), and 846, which violations include, but are not limited to, the violations contained in, referenced in, and supporting Counts One to Three, Eleven to Twelve, Twenty-Six to Twenty-Eight, Thirty to Thirty-Two, Thirty-Six to Sixty-One, Sixty-Three to Sixty Seven, Sixty-Nine, Eighty to Eighty One, and Eighty-Five to Eighty-Seven of this indictment, which violations are all re-alleged and incorporated herein as if set out word-for-word, and said violations were part of a continuing series of violations of Title 21, United States Code, Sections 801, et seq., undertaken by the defendants, in concert with five or more other persons, which could include but not be limited to indicted and unindicted co-conspirators and others, including the defendants listed in this indictment, with respect to whom the defendants occupied a position of organizer, supervisor, or manager and from this ongoing criminal enterprise the defendants obtained substantial income or resources, all in violation of Title 21, United States Code, Section 848(a).

COUNT TWO

Beginning on an unknown date, but no later than on or about February 28, 2020, and continuing through the date of this indictment, said dates being approximate, in Jackson County, within the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** **JESUS MORALES-GARCIA, a.k.a.**

“DON JESUS,” LUIS EDUARDO PINEDA-ZARAO, JUAN BERNARDO GALEANA-AGUILAR, SANTIAGO RAUL MENDIETA-SANCHEZ, BALTAZAR FLORES-NORZAGARAY, a.k.a. “SINALOA,” FELTON STONE, JR., DONALD R. MOSES, a.k.a. “MOE,” RAFAEL PEREZ-ESQUIVEL, FLOR GONZALEZ-CELESTINE, TINA MARIE CRUCES, JOSE ELIAZAR VALLE-RIVERA, MARCO ANTONIO SALAZAR, a.k.a. “TOÑO,” UZIEL MORALES-BALTAZAR, JOSE BERNABE ZAMORA-CARDENAS, a.k.a. “MUFA,” LISBET ESPINO, FELIPE ANTONIO ALCALA, ERICK FERNANDO MARTINEZ CONTRERAS, a.k.a. “ALEX,” ANTHONY C. HUGHES, JENNIFER S. LAWSON, JOEL ENRIQUE ROMAN, a.k.a. “PELON,” FRANK ANTHONY VALDIVIA, MELISSA A. BATES, MONICA L. MCCUBBIN, MIGUEL ANGEL JUAREZ-LOPEZ, a.k.a. “CHAPO,” MARIA NANCY VALDEZ, IGNACIO BARRAGAN-VAZQUEZ, JONATHAN ZUNIGA-VILLAFUERTE, YVONNE GUZMAN-CARPIO, a.k.a. “MORENA,” NELSON ALIRIO GARCIA-GUERRA, KONGMHINK HER, SERGIO ARMANDO VALENCIA-OCHOA, JUAN HUMBERTO LEMUS-MEJIA, YULIANA DEL CARMEN PEREZ CIPRIAN, TRINIDAD TORRES-MEZA, MIRIAM VERONICA BUSTOS-MARTINEZ, LILIANA VALENCIA-MENDOZA, ARANTXA SABRINA VALDERRAMA-BARROS, a.k.a. “SABRI,” DANIEL FELIPE SUAREZ-REINOSO, JAVIER A. ALVAREZ, JOHN A. CAYLOR, a.k.a. “JOHN TAYLOR,” ANA LILIA LEAL-MARTINEZ, ANA PAOLA BANDA, and MARIA DE LOURDES CARBAJAL, knowingly and intentionally conspired and agreed with one another and others, both known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), 50 grams or more of actual methamphetamine, a

Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), and one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT THREE

Beginning on an unknown date, but no later than on or about May 23, 2020, and continuing through the date of this indictment, said dates being approximate, in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,” JOSE BERNABE ZAMORA-CARDENAS, a.k.a. “MUFA,” SERGIO ARMANDO VALENCIA-OCHOA, LILIANA VALENCIA-MENDOZA, DANIEL FELIPE SUAREZ-REINOSO, ANA LILIA LEAL-MARTINEZ, ANA PAOLA BANDA, and MARIA DE LOURDES CARBAJAL**, knowingly and intentionally conspired and agreed with one another and others, both known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 18, United States Code, Section 1956, to wit: to transport, transmit, and transfer and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, that is, the United Mexican States, with the intent to promote the carrying on of specified unlawful activity, that is, a conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 846, all in violation of Title 18, United States Code, Section 1956(a)(2)(A); and to conduct or attempt to conduct financial transactions affecting interstate commerce, said transactions involving the proceeds of specified unlawful activity, to wit: conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 846, and do so knowing that the transaction was designed, in whole or in part, to conceal or disguise the nature,

location, source, ownership, or control of the proceeds of said specified unlawful activity, and while conducting or attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

COUNT FOUR

On or about February 13, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FIVE

On or about February 20, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SIX

On or about March 12, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SEVEN

On or about March 25, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a

mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT EIGHT

On or about April 9, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT NINE

On or about April 10, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TEN

On or about April 21, 2020, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ELEVEN

On or May 27, 2020, in the Western District of Missouri, the defendant, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. "MICHOACÁNO,"** did knowingly conduct and attempt to conduct a financial transaction, to wit: transferred a bag containing approximately \$198,925 in United States currency, which involved one or more monetary instruments and in any way or degree affected interstate or foreign commerce, and which involved the proceeds of a specified

unlawful activity, that is, a conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 846, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, and that while conducting and attempting to conduct the financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT TWELVE

On or May 27, 2020, in the Western District of Missouri, the defendant, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** an alien, was found in the United States after having been denied admission, deported, removed, and excluded therefrom on or about September 14, 2019, at or near Hidalgo, Texas, without having obtained the express consent of the Secretary of Homeland Security or the Attorney General of the United States for readmission into the United States, in violation of Title 8, United States Code, Section 1326(a).

COUNT THIRTEEN

On or about June 21, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. “JOHN TAYLOR,”** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FOURTEEN

On or June 22, 2021, in the Western District of Missouri, and elsewhere, the defendant, **UZIEL MORALES-BALTAZAR,** did aid and abet and knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of

Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or June 24, 2021, in the Western District of Missouri, the defendants, **FLOR GONZALEZ-CELESTINE** and **TRINIDAD TORRES-MEZA**, did aid and abet and knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and Title 18, United States Code, Section 2.

COUNT SIXTEEN

On or June 24, 2021, in the Western District of Missouri, the defendant, **FLOR GONZALEZ-CELESTINE**, an alien, was found in the United States after having been denied admission, deported, removed, and excluded therefrom on or about November 17, 2017, at or near Brownsville, Texas, and on or about January 18, 2018, at or near San Ysidro, California, without having obtained the express consent of the Secretary of Homeland Security or the Attorney General of the United States for readmission into the United States, in violation of Title 8, United States Code, Section 1326(a).

COUNT SEVENTEEN

On or about June 28, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT EIGHTEEN

On or about June 30, 2021, in the Western District of Missouri, the defendant, **FLOR GONZALEZ-CELESTINE**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT NINETEEN

On or about July 13, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY

On or about July 14, 2021, in the Western District of Missouri, the defendant, **FLOR GONZALEZ-CELESTINE**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT TWENTY-ONE

On or about July 26, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-TWO

On or about July 26, 2021, in the Western District of Missouri, the defendant, **RAFAEL PEREZ-ESQUIVEL**, knowingly and intentionally distributed 50 grams or more of actual

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT TWENTY-THREE

On or about July 26, 2021, in the Western District of Missouri, the defendant, **RAFAEL PEREZ-ESQUIVEL**, knowingly possessed a firearm, to wit, a silver handgun, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and distribution of 50 grams or more of actual methamphetamine, as charged in Count Twenty-Two, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); and *Pinkerton v. United States*, 328 U.S. 640 (1946) (coconspirator liability).

COUNT TWENTY-FOUR

On or August 5, 2021, in the Western District of Missouri, the defendants, **BALTAZAR FLORES-NORZAGARAY, a.k.a. "SINALOA,"** and **FLOR GONZALEZ-CELESTINE**, did aid and abet and knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

On or about August 17, 2021, at approximately 4:05 p.m., in the Western District of Missouri, and elsewhere, the defendant, **MARCO ANTONIO SALAZAR, a.k.a. "TOÑO,"** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that

is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SIX

On or about August 18, 2021, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT TWENTY-SEVEN

On or about August 19, 2021, in the Western District of Missouri, the defendants, **JENNIFER S. LAWSON** and **ANTHONY C. HUGHES**, did aid and abet and knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

On or about August 19, 2021, in the Western District of Missouri, the defendant, **BALTAZAR FLORES-NORZAGARAY, a.k.a. "SINALOA,"** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT TWENTY-NINE

On or about August 26, 2021, in the Western District of Missouri, the defendant, **BALTAZAR FLORES-NORZAGARAY, a.k.a. "SINALOA,"** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT THIRTY

On or about August 27, 2020, in the Western District of Missouri, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **LILIANA VALENCIA-MENDOZA, a.k.a. “LILI,”** knowingly and intentionally possessed, with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT THIRTY-ONE

On or about September 4, 2021, at approximately 10:18 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FELTON STONE, JR.,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-TWO

On or about September 8, 2021, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON,** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT THIRTY-THREE

On or about September 13, 2021, at approximately 9:40 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FELTON STONE, JR.,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United

States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-FOUR

On or about September 14, 2021, at approximately 9:26 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **JUAN BERNARDO GALEANA-AGUILAR**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-FIVE

On or about September 15, 2021, at approximately 9:56 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **SANTIAGO RAUL MENDIETA-SANCHEZ**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-SIX

On or about September 21, 2021, in Jackson County, in the Western District of Missouri, the defendant, **JENNIFER S. LAWSON**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT THIRTY-SEVEN

On or about September 23, 2021, in the Western District of Missouri, the defendant, **BALTAZAR FLORES-NORZAGARAY, a.k.a. "SINALOA,"** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT THIRTY-EIGHT

On or about September 23, 2021, in the Western District of Missouri, the defendant, **BALTAZAR FLORES-NORZAGARAY, a.k.a. "SINALOA,"** an alien, was found in the United States after having been denied admission, deported, removed, and excluded therefrom on or about July 2, 2010, at or near Nogales, Arizona, and on or about May 5, 2012, at or near Nogales, Arizona, without having obtained the express consent of the Secretary of Homeland Security or the Attorney General of the United States for readmission into the United States, in violation of Title 8, United States Code, Section 1326(a).

COUNT THIRTY-NINE

On or about September 30, 2021, in the Western District of Missouri, the defendant, **JESUS MORALES-GARCIA, a.k.a. "DON JESUS,"** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT FORTY

On or about October 6, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FORTY-ONE

On or about October 7, 2021, in the Western District of Missouri, the defendant, **BALTAZAR FLORES-NORZAGARAY, a.k.a. “SINALOA,”** knowingly possessed a firearm, to wit, a Hammerli brand, TAC-R1 model, .22LR-caliber rifle bearing Serial Number HAD03542, a Taurus brand, G2C model, nine-millimeter handgun bearing Serial Number ABE603754, and a Taurus brand, 856 model, .38SPL-caliber revolver bearing Serial Number LT94133, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FORTY-TWO

On or about October 9, 2021, at approximately 7:00 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **LUIS EDUARDO PINEDA-ZARAO,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-THREE

On or about October 10, 2021, at approximately 2:42 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **SANTIAGO RAUL MENDIETA-SANCHEZ,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of

an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-FOUR

On or about October 10, 2021, at approximately 3:03 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **DONALD R. MOSES, a.k.a. “MOE,”** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-FIVE

On or about October 11, 2021, at approximately 2:38 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,” LISBET ESPINO,** and **JENNIFER S. LAWSON,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-SIX

On or about October 11, 2021, at approximately 4:06 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **DONALD R. MOSES, a.k.a. “MOE,”** knowingly and intentionally

used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-SEVEN

On or about October 11, 2021, at approximately 12:26 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **LUIS EDUARDO PINEDA-ZARAO**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-EIGHT

On or about October 11, 2021, at approximately 8:40 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **SANTIAGO RAUL MENDIETA-SANCHEZ**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-NINE

On or about October 12, 2021, at approximately 12:09 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** **JOEL ENRIQUE ROMAN, a.k.a. “PELON,”** and **MONICA L.**

MCCUBBIN, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY

On or about October 12, 2021, at approximately 7:36 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,” LISBET ESPINO**, and **ANTHONY C. HUGHES**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-ONE

On or about October 12, 2021, at approximately 1:07 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **LUIS EDUARDO PINEDA-ZARAO**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-TWO

On or October 13, 2021, in the Western District of Missouri, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **LISBET ESPINO**, did aid and abet and

knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and Title 18, United States Code, Section 2.

COUNT FIFTY-THREE

On or about October 13, 2021, at approximately 10:34 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **JOEL ENRIQUE ROMAN, a.k.a. “PELON,”** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-FOUR

On or about October 13, 2021, at approximately 2:14 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **LISBET ESPINO,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-FIVE

On or about October 13, 2021, at approximately 2:17 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **LUIS EDUARDO PINEDA-ZARAO,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act

constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-SIX

On or about October 15, 2021, at approximately 2:32 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FELTON STONE, JR.**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute cocaine, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-SEVEN

On or about October 15, 2021, at approximately 5:17 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **SANTIAGO RAUL MENDIETA-SANCHEZ**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-EIGHT

On or about October 15, 2021, at approximately 7:43 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **SANTIAGO RAUL MENDIETA-SANCHEZ**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a

felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-NINE

On or about October 16, 2021, at approximately 12:31 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FELTON STONE, JR.**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute cocaine, in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY

On or about October 17, 2021, at approximately 10:59 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FELTON STONE, JR.**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute cocaine, in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-ONE

On or about October 20, 2021, in the Western District of Missouri, the defendant, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT SIXTY-TWO

On or about October 20, 2021, in the Western District of Missouri, the defendant, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** knowing he was an alien illegally and unlawfully in the United States, did knowingly possess, in and affecting commerce, a firearm, to wit, a Glock brand, model 20, 10-millimeter handgun bearing Serial Number VN212, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(2).

COUNT SIXTY-THREE

On or about October 20, 2021, in the Western District of Missouri, the defendant, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** an alien, was found in the United States after having been denied admission, deported, removed, and excluded therefrom on or about February 17, 2016, at or near San Luis, Arizona, and on or about March 20, 2016, at or near San Luis, Arizona, without having obtained the express consent of the Secretary of Homeland Security or the Attorney General of the United States for readmission into the United States, in violation of Title 8, United States Code, Section 1326(a).

COUNT SIXTY-FOUR

On or about October 29, 2021, at approximately 9:34 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FELTON STONE, JR.,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-FIVE

On or about October 30, 2021, at approximately 1:03 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **DONALD R. MOSES, a.k.a. “MOE,”** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-SIX

On or about October 31, 2021, at approximately 3:06 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **JUAN HUMBERTO LEMUS-MEJIA,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-SEVEN

On or about October 31, 2021, at approximately 4:42 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** **YULIANA DEL CARMEN PEREZ CIPRIAN,** and **JENNIFER S. LAWSON,** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code,

Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-EIGHT

On or about November 3, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SIXTY-NINE

On or about November 19, 2021, in the Western District of Missouri, the defendant, **JOSE ELIAZAR VALLE-RIVERA,** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT SEVENTY

On or about November 20, 2021, at approximately 6:44 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. "MICHOACÁNO," YULIANA DEL CARMEN PEREZ CIPRIAN,** and **DONALD R. MOSES, a.k.a. "MOE,"** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-ONE

On or about November 21, 2021, at approximately 3:22 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a.**

“MICHOACÁNO,” and **ANTHONY C. HUGHES**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-TWO

On or about November 22, 2021, in the Western District of Missouri, the defendant, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT SEVENTY-THREE

On or about November 26, 2021, at approximately 2:00 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **JOSE BERNABE ZAMORA-CARDENAS, a.k.a. “MUFA,”** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-FOUR

On or about November 28, 2021, at approximately 6:47 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **FRANK ANTHONY VALDIVIA**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under

Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-FIVE

On or about December 1, 2021, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SEVENTY-SIX

On or about December 2, 2021, in the Western District of Missouri, the defendant, **LISBET ESPINO,** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT SEVENTY-SEVEN

On or about December 7, 2021, in the Western District of Missouri, the defendants, **JESUS MORALES-GARCIA, a.k.a. "DON JESUS,"** and **JOSE BERNABE ZAMORA-CARDENAS, a.k.a. "MUFA,"** did aid and abet and knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and Title 18, United States Code, Section 2.

COUNT SEVENTY-EIGHT

On or December 7, 2021, in the Western District of Missouri, the defendant, **JOSE BERNABE ZAMORA-CARDENAS, a.k.a. "MUFA,"** an alien, was found in the United States after having been denied admission, deported, removed, and excluded therefrom on or about

August 23, 2002, at or near El Paso, Texas, without having obtained the express consent of the Secretary of Homeland Security or the Attorney General of the United States for readmission into the United States, in violation of Title 8, United States Code, Section 1326(a).

COUNT SEVENTY-NINE

On or about January 12, 2022, in the Western District of Missouri, the defendant, **JOEL ENRIQUE ROMAN, a.k.a. "PELON,"** knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT EIGHTY

On or about January 12, 2022, in the Western District of Missouri, the defendant, **JOEL ENRIQUE ROMAN, a.k.a. "PELON,"** knowingly possessed a firearm, to wit, a Taurus brand, PT111 G2 model, nine-millimeter, semi-automatic handgun, bearing Serial Number TKX66100, and a Sundance Industries brand, .25-caliber handgun, bearing Serial Number 041026, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and possession with the intent to distribute 50 grams or more of actual methamphetamine, as charged in Count Seventy-Nine, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT EIGHTY-ONE

On or about January 12, 2022, in the Western District of Missouri, the defendant, **JOEL ENRIQUE ROMAN, a.k.a. "PELON,"** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to

wit, a Taurus brand, PT111 G2 model, nine-millimeter, semi-automatic handgun, bearing Serial Number TKX66100, and a Sundance Industries brand, .25-caliber handgun, bearing Serial Number 041026, and said firearm had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHTY-TWO

On or about January 13, 2022, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly and intentionally possessed, with the intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT EIGHTY-THREE

On or about January 13, 2022, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowingly possessed a firearm, to wit, a Bersa brand, Thunder 380 model, .380-caliber handgun bearing Serial Number G22041, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and possession with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, as charged in Count Eighty-Two, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT EIGHTY-FOUR

On or about January 13, 2022, in the Western District of Missouri, the defendant, **JOHN A. CAYLOR, a.k.a. "JOHN TAYLOR,"** knowing he had previously been convicted of a crime

punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Bersa brand, Thunder 380 model, .380-caliber handgun bearing Serial Number G22041, and said firearm had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHTY-FIVE

On or about January 19, 2022, in the Western District of Missouri, the defendant, **JOEL ENRIQUE ROMAN, a.k.a. "PELON,"** knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT EIGHTY-SIX

On or about February 9, 2022, in the Western District of Missouri, the defendant, **FELIPE ANTONIO ALCALA,** knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT EIGHTY-SEVEN

On or about February 9, 2022, in the Western District of Missouri, the defendant, **FELIPE ANTONIO ALCALA,** knowingly possessed a firearm, to wit, a Kahr brand, nine-millimeter handgun bearing Serial Number EJ6826, a Black Rain brand, .308-caliber, semi-automatic rifle bearing Serial Number SL006402, a Cobra brand, .380-caliber handgun bearing Serial Number CP082197, and an AK-style, 7.62-caliber rifle bearing no Serial Number, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and

possession with the intent to distribute 50 grams or more of actual methamphetamine, as charged in Count Eighty-Six, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); and *Pinkerton v. United States*, 328 U.S. 640 (1946) (coconspirator liability).

COUNT EIGHTY-EIGHT

On or about February 14, 2022, in the Western District of Missouri, the defendant, **TINA MARIE CRUCES**, knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT EIGHTY-NINE

On or March 16, 2022, in the Western District of Missouri, the defendants, **TINA MARIE CRUCES** and **MELISSA A. BATES**, did aid and abet and knowingly and intentionally distributed five grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B); and Title 18, United States Code, Section 2.

COUNT NINETY

On or March 22, 2022, in the Western District of Missouri, the defendant, **MELISSA A. BATES**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT NINETY-ONE

On or about March 27, 2022, at approximately 10:50 a.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. "DON JESUS,"** and **JUAN BERNARDO GALEANA-AGUILAR**, knowingly and intentionally used a

communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT NINETY-TWO

On or about March 27, 2022, at approximately 5:35 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **JUAN BERNARDO GALEANA-AGUILAR**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT NINETY-THREE

On or March 28, 2022, in the Western District of Missouri, the defendant, **MELISSA A. BATES**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT NINETY-FOUR

On or about March 30, 2022, at approximately 9:03 p.m., in the Western District of Missouri, and elsewhere, the defendants, **SANTIAGO RAUL MENDIETA-SANCHEZ** and **ERICK FERNANDO MARTINEZ CONTRERAS, a.k.a. “ALEX,”** knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT NINETY-FIVE

On or about April 5, 2022, at approximately 7:02 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **MIRIAM VERONICA BUSTOS-MARTINEZ**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT NINETY-SIX

On or April 6, 2022, in the Western District of Missouri, the defendant, **MELISSA A. BATES**, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT NINETY-SEVEN

On or about April 6, 2022, at approximately 12:32 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **JUAN BERNARDO GALEANA-AGUILAR**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT NINETY-EIGHT

On or about April 8, 2022, at approximately 4:10 p.m., in the Western District of Missouri, and elsewhere, the defendants, **JESUS MORALES-GARCIA, a.k.a. “DON JESUS,”** and **DONALD R. MOSES, a.k.a. “MOE,”** knowingly and intentionally used a communication

facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT NINETY-NINE

On or about April 10, 2022, at approximately 5:23 p.m., in the Western District of Missouri, and elsewhere, the defendant, **FRANK ANTHONY VALDIVIA**, knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 843(b).

COUNT ONE HUNDRED

On or about April 15, 2022, in the Western District of Missouri, the defendant, **MELISSA A. BATES**, knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT ONE HUNDRED ONE

On or about April 15, 2022, in the Western District of Missouri, the defendant, **MELISSA A. BATES**, knowingly possessed a firearm, to wit, a Heritage .22-caliber handgun bearing Serial Number 1BH221841; a High Standard .22-caliber handgun bearing Serial Number 106434; and a Colt .22-caliber handgun bearing Serial Number 2272CB1, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and possession

with the intent to distribute 50 grams or more of actual methamphetamine, as charged in Count One Hundred, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT ONE HUNDRED TWO

On or April 28, 2022, in the Western District of Missouri, the defendant, **ERICK FERNANDO MARTINEZ CONTRERAS, a.k.a. “ALEX,”** knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT ONE HUNDRED THREE

On or about June 6, 2022, in the Western District of Missouri, the defendant, **JAVIER A. ALVAREZ,** knowingly and intentionally possessed, with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT ONE HUNDRED FOUR

On or about June 8, 2022, in the Western District of Missouri, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,”** and **YULIANA DEL CARMEN PEREZ CIPRIAN,** did aid and abet and knowingly and intentionally possessed, with the intent to distribute, five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED FIVE

On or about June 8, 2022, in the Western District of Missouri, the defendant, **DONALD R. MOSES, a.k.a. "MOE,"** knowingly and intentionally possessed, with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and 400 grams or more of a mixture or substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide ("fentanyl"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT ONE HUNDRED SIX

On or about June 8, 2022, in the Western District of Missouri, the defendant, **DONALD R. MOSES, a.k.a. "MOE,"** knowingly possessed, with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and 400 grams or more of a mixture or substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide ("fentanyl"), a Schedule II controlled substance, in or on, or within 1,000 feet of, the real property comprising a public or private elementary, vocational, or secondary school, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

COUNT ONE HUNDRED SEVEN

On or about June 8, 2022, in the Western District of Missouri, the defendant, **DONALD R. MOSES, a.k.a. "MOE,"** knowingly possessed a firearm, to wit, a Glock brand, 30 model, .45-caliber pistol bearing Serial Number WAR372, a Smith and Wesson brand, MP-15 model, AR-style rifle bearing Serial Number SU38934, a Anderson Arms brand, AM-15 model, AR-style rifle bearing Serial Number 16091967, a .410 bore shotgun not bearing a Serial Number, a Glock brand, 22 model, nine-millimeter pistol bearing Serial Number AFZG226, and a Glock brand, 19 model, nine-millimeter pistol bearing Serial Number BBRX551, in furtherance of conspiracy to

distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and possession with the intent to distribute 500 grams or more of methamphetamine and 400 grams or more of fentanyl, as charged in Count One Hundred Five, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT ONE HUNDRED EIGHT

On or about June 8, 2022, in the Western District of Missouri, the defendant, **FRANK ANTHONY VALDIVIA**, knowingly and intentionally possessed, with the intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ONE HUNDRED NINE

On or about June 8, 2022, in the Western District of Missouri, the defendant, **ANTHONY C. HUGHES**, knowingly and intentionally possessed, with the intent to distribute, five grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT ONE HUNDRED TEN

On or about June 8, 2022, in the Western District of Missouri, the defendant, **ANTHONY C. HUGHES**, knowingly and intentionally possessed, with the intent to distribute, any amount of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ONE HUNDRED ELEVEN

On or about June 8, 2022, in the Western District of Missouri, the defendant, **LISBET ESPINO**, knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT ONE HUNDRED TWELVE

On or about June 8, 2022, in the Western District of Missouri, the defendant, **LISBET ESPINO**, knowingly possessed a firearm, to wit, a Smith & Wesson brand, nine-millimeter pistol bearing Serial Number PDH7899, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 50 grams of actual methamphetamine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, as charged in Count Two, and possession with the intent to distribute 50 grams or more of actual methamphetamine, as charged in Count One Hundred Eleven, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE ALLEGATION ONE

1. The allegations contained in Counts One and Two of this Indictment are realleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the controlled substance offense alleged in Counts One and Two of this Indictment, the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁÑO,” JESUS MORALES-GARCIA, a.k.a. “DON JESUS,” LUIS EDUARDO PINEDA-ZARAO, JUAN BERNARDO GALEANA-AGUILAR, SANTIAGO RAUL MENDIETA-SANCHEZ, BALTAZAR FLORES-NORZAGARAY, a.k.a. “SINALOA,”**

FELTON STONE, JR., DONALD R. MOSES, a.k.a. “MOE,” RAFAEL PEREZ-ESQUIVEL, FLOR GONZALEZ-CELESTINE, TINA MARIE CRUCES, JOSE ELIAZAR VALLE-RIVERA, MARCO ANTONIO SALAZAR, a.k.a. “TOÑO,” UZIEL MORALES-BALTAZAR, JOSE BERNABE ZAMORA-CARDENAS, a.k.a. “MUFA,” LISBET ESPINO, FELIPE ANTONIO ALCALA, ERICK FERNANDO MARTINEZ CONTRERAS, a.k.a. “ALEX,” ANTHONY C. HUGHES, JENNIFER S. LAWSON, JOEL ENRIQUE ROMAN, a.k.a. “PELON,” FRANK ANTHONY VALDIVIA, MELISSA A. BATES, MONICA L. MCCUBBIN, MIGUEL ANGEL JUAREZ-LOPEZ, a.k.a. “CHAPO,” MARIA NANCY VALDEZ, IGNACIO BARRAGAN-VAZQUEZ, JONATHAN ZUNIGA-VILLAFUERTE, YVONNE GUZMAN-CARPIO, a.k.a. “MORENA,” NELSON ALIRIO GARCIA-GUERRA, KONGMHINK HER, SERGIO ARMANDO VALENCIA-OCHOA, JUAN HUMBERTO LEMUS-MEJIA, YULIANA DEL CARMEN PEREZ CIPRIAN, TRINIDAD TORRES-MEZA, MIRIAM VERONICA BUSTOS-MARTINEZ, LILIANA VALENCIA-MENDOZA, ARANTXA SABRINA VALDERRAMA-BARROS, a.k.a. “SABRI,” DANIEL FELIPE SUAREZ-REINOSO, JAVIER A. ALVAREZ, JOHN A. CAYLOR, a.k.a. “JOHN TAYLOR,” ANA LILIA LEAL-MARTINEZ, ANA PAOLA BANDA, and MARIA DE LOURDES CARBAJAL, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment, including, but not limited to the following:

a. approximately \$277,440 in United States currency seized from a vehicle driven by **SUAREZ-Reinoso** in Lafayette County, Missouri, on or about November 16, 2021;

b. approximately \$31,000 in United States currency seized during a search of 1600 East 42nd Street, Kansas City, Missouri, on or about February 9, 2022;

c. approximately \$21,445 in United States currency seized during a search of 5400 McCoy Street, Kansas City, Missouri, on or about April 15, 2022;

d. approximately \$58,398 in United States currency seized during a search of 3231 Jackson Avenue, Kansas City, Missouri, on or about June 8, 2022;

e. approximately \$4,020 in United States currency seized during a search of 1508 East 49th Terrace, Kansas City, Missouri, on or about June 8, 2022; and

f. a money judgment of not less than \$4,718,700, in that at least this sum, in aggregate, was obtained directly and indirectly as a result of the defendants' participation in the drug conspiracy alleged in Counts One or Two, which involved the unlawful distribution of more than 335.5 kilograms (approximately 11,834 ounces) of methamphetamine, with an average street price of \$300 per ounce; and more than 22.1 kilograms (approximately 779 ounces) of heroin, with an average street price of \$1,500 per ounce.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant(s):

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION TWO

1. The allegations contained in Count Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1), and the procedures outlined in Title 21, United States Code, Section 853.

2. Upon conviction of any violation of Title 18, United States Code, Section 1956(h), the defendants, **JOSE JESUS SANCHEZ-MENDEZ, a.k.a. “MICHOACÁNO,” JOSE BERNABE ZAMORA-CARDENAS, a.k.a. “MUFA,” SERGIO ARMANDO VALENCIA-OCHOA, LILIANA VALENCIA-MENDOZA, DANIEL FELIPE SUAREZ-REINOSO, ANA LILIA LEAL-MARTINEZ, ANA PAOLA BANDA, and MARIA DE LOURDES CARBAJAL**, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. The property subject to forfeiture includes, but is not limited to, a forfeiture money judgment representing the proceeds obtained by the defendants, in that such sum in aggregate, is involved in, or is derived from, proceeds traceable to the offense set forth in Count Three.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the above-forfeitable property or to seek return of the property to the jurisdiction of the Court so that the property may be seized and forfeited.

All pursuant to the provisions of Title 18, United States Code, Section 982(a)(2) and the procedures outlined in Title 21, United States Code, Section 853(p).

A TRUE BILL.

/s/ Kathleen Shaw

FOREPERSON OF THE GRAND JURY

/s/ Byron H. Black

BYRON H. BLACK

Assistant United States Attorney

DATED: 9/20/2022

Kansas City, Missouri